

EXHIBIT AC

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,
Petitioner,

v.

COREPHOTONICS, LTD.,
Patent Owner.

Case No. IPR2020-00896
U.S. Patent No. 10,317,647

PATENT OWNER'S RESPONSE

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 U.S. Patent No. 10,317,647

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	1. Claim 1 and 4	28
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1.	A POSITA would not have modified Ogino in view of Chen II and Bareau to render claims 2, 3 and 5 unpatentable.....	52
2.	A POSITA would not have modified Ogino in view of Chen II and Bareau to render claims 8-11 unpatentable.	58
C.	GROUND 4 - The Petition Fails to Demonstrate that Ogino in view of Chen II, Bareau and Kingslake renders claim 6 unpatentable.	63
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III. LEVEL OF ORDINARY SKILL

Petitioner offers that a “person having ordinary skill in the art (“POSITA”) would include someone who had, at the priority date of the ’647 Patent, (i) a Bachelor’s degree in Physics, Optical Sciences, or equivalent training, as well as (ii) approximately three years of experience in designing multi-lens optical systems.” Pet. at 7. Further, “[s]uch a person would have had experience in analyzing, tolerancing, adjusting, and optimizing multi-lens systems for manufacturing, and would have been familiar with the specifications of lens systems and their fabrication.” *Id.* Petitioner also submits that “a POSITA would have known how to use lens design software such as Codev, Oslo, or Zemax, and would have taken a lens design course or had equivalent training.” *Id.* Patent Owner does not disagree with Dr. Durand’s definition of a POSITA. Ex. 2001, Milster Decl., ¶20.

IV. CLAIM CONSTRUCTION

Petitioner notes that two terms, “Effective Focal Length (EFL)” and “Total Track Length (TTL),” have previously been construed in relation to other patents that share a common specification with the ’647 Patent. Pet. at 8. Specifically, the Board construed these two terms in IPR2018-01140 as follows: